

Exhibit 18

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
Chapter 11 Case
CASE NO. 08:13555 (SCC)
Ref. Docket Nos. 4271, 4349

IN RE:

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

TRANSCRIPT OF
DEPOSITION OF ANGHARAD BOWDLER

TRANSCRIPT of the stenographic
notes of the proceedings in the
above-entitled matter, as taken by and
before TAB PREWETT, a Registered
Professional Reporter, a Certified
Shorthand Reporter, a Certified LiveNote
Reporter, and Notary Public, held at the
Offices of WEIL, GOTSHAL & MANGES LLP, 767
Fifth Avenue, New York, New York, on
Wednesday, December 2, 2015, commencing at
1:15 p.m.

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2 A P P E A R A N C E S:

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WEIL GOTSHAL & MANGES LLP

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BY: MAURICE HORWITZ, ESQ.

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DENISE ALVAREZ, ESQ.

7

767 Fifth Avenue

8

New York, New York 10153-0119

9

Attorneys for

10

Lehman Brothers Holdings, Inc.

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12

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14

HOGAN LOVELLS LLP

15

BY: M. SHANE JOHNSON, ESQ.

16

875 Third Avenue

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New York, New York 10022

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Attorneys for Dr. Thomas Marsoner

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ALSO PRESENT:

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Mark Euler, Esq.

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Senior Legal Counsel

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EPIQ Systems

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Present Telephonically

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1 Angharad Bowdler

2 incorrectly listed. Yes.

3 Q Isn't it possible that there
4 were other errors in the service of party
5 notice?

6 MR. HORWITZ: Objection to the
7 form.

8 A I am not aware of any other
9 errors.

10 Q Now, EPIQ attempts to send
11 notice to a creditor's last known address,
12 correct?

13 A That's correct.

14 (Exhibit No. 4, E-Mail with
15 attachment, E-Mail dated 7/19/08 from
16 Aaron O. Johari to Guy Reynolds and
17 others, Bates Nos. LEH 384 to 395, is
18 marked by the reporter for
19 identification.)

20 Q This is an E-Mail from Aaron
21 Johari at Lehman Brothers to a number of
22 people at Linklaters and Bruce Railton and
23 Marco Pierettori at Lehman Brothers, dated
24 September 19, 2008.

25 This was after LBHI had filed

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2 MR. HORWITZ: Objection to the
3 form.

4 A I actually don't know the
5 answer to that. Some creditors have
6 multiple addresses, and noticing addresses
7 and attorneys that represent them -- in
8 general, we pull every address available
9 for the creditor, or the financial advisor
10 would do so.

11 Q So Alvarez didn't pull this
12 address for you?

13 MR. HORWITZ: Objection.

14 A This address was not provided
15 to EPIQ to my knowledge.

16 Q Do you know why it wasn't
17 provided?

18 A No, I do not.

19 Q If Alvarez had sent this
20 address to you, would you have sent
21 Dr. Marsoner notice at this address?

22 MR. HORWITZ: Objection to the
23 form.

24 A Yes, if it was provided, we
25 would have sent it to this address.

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2 Q Okay. Does EPIQ consider it
3 good practice to send notice to vacation
4 addresses?

5 A We are not aware of different
6 addresses and what they represent for the
7 creditor, so I don't have an opinion on
8 that.

9 Q So in other words, you don't
10 check if an address is a vacation address?

11 A No.

12 Q You don't check if it's a
13 temporary address?

14 A No, nor is that information
15 provided to us.

16 Q Well, I mean, you don't do an
17 independent check?

18 A No, we do not.

19 Q So the same could be said for
20 addresses that are no longer valid?

21 MR. HORWITZ: Objection to the
22 form.

23 A I'm sorry. I am not sure what
24 the question is.

25 Q You don't do an independent

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2 check on the validity of an address?

3 MR. HORWITZ: Objection to the
4 form.

5 A We don't confirm that the
6 address is correct for that creditor. If
7 solely a name is provided or a partial
8 address that would not be mailable, that we
9 may send back to the party that provided it
10 to us to request additional detail.

11 Q So if you are provided a full
12 address, you don't independently check it?

13 A That's correct.

14 Q Would you check to make sure
15 you are not sending a notice to a former
16 affiliate's address, former affiliate of
17 Lehman Brothers?

18 A No, we would not check that.

19 Q Because essentially Alvarez
20 provides you the addresses, and, as long as
21 they are full address, you don't check
22 them?

23 A That's correct.

24 Q If you could look at Exhibit 3,
25 "Corrected Affidavit of Service," in the